

## Section 1. Registration Information

### Source Identification

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Facility Name: Pool Chlor of Tucson  
Parent Company #1 Name:  
Parent Company #2 Name:

### Submission and Acceptance

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Submission Type: Re-submission  
Subsequent RMP Submission Reason: 5-year update (40 CFR 68.190(b)(1))  
Description:  
Receipt Date: 16-Aug-2010  
Postmark Date: 16-Aug-2010  
Next Due Date: 16-Aug-2015  
Completeness Check Date: 16-Aug-2010  
Complete RMP: Yes  
De-Registration / Closed Reason:  
De-Registration / Closed Reason Other Text:  
De-Registered / Closed Date:  
De-Registered / Closed Effective Date:  
Certification Received: Yes

### Facility Identification

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EPA Facility Identifier: 1000 0011 7982  
Other EPA Systems Facility ID:

### Dun and Bradstreet Numbers (DUNS)

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Facility DUNS: 799043021  
Parent Company #1 DUNS: 785633058  
Parent Company #2 DUNS:

### Facility Location Address

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Street 1: 3116 East Pennsylvania Ave.  
Street 2:  
City: Tucson  
State: ARIZONA  
ZIP: 85714  
ZIP4:  
County: PIMA

### Facility Latitude and Longitude

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Latitude (decimal): 32.171455  
Longitude (decimal): -110.926003  
Lat/Long Method: Interpolation - Digital map source (TIGER)  
Lat/Long Description: Center of Facility  
Horizontal Accuracy Measure: 100  
Horizontal Reference Datum Name: North American Datum of 1983  
Source Map Scale Number:

## Owner or Operator

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Operator Name:	Que Hale
Operator Phone:	(520) 882-8532

## Mailing Address

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Operator Street 1:	3116 East Pennsylvania Ave
Operator Street 2:	
Operator City:	Tucson
Operator State:	ARIZONA
Operator ZIP:	85714
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

## Name and title of person or position responsible for Part 68 (RMP) Implementation

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RMP Name of Person:	Que Hales
RMP Title of Person or Position:	General Manager
RMP E-mail Address:	que@poolchlor.com

## Emergency Contact

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Emergency Contact Name:	Que Hales
Emergency Contact Title:	General Manager
Emergency Contact Phone:	(520) 882-8532
Emergency Contact 24-Hour Phone:	(520) 861-4262
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	que@poolchlor.com

## Other Points of Contact

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Facility or Parent Company E-mail Address:  
Facility Public Contact Phone:  
Facility or Parent Company WWW Homepage  
Address:

## Local Emergency Planning Committee

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LEPC:	Pima County LEPC
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## Full Time Equivalent Employees

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Number of Full Time Employees (FTE) on Site:	15
FTE Claimed as CBI:	

## Covered By

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OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	
Air Operating Permit ID:	

## OSHA Ranking

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OSHA Star or Merit Ranking:

## Last Safety Inspection

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Last Safety Inspection (By an External Agency) Date:	31-Jan-2009
Last Safety Inspection Performed By an External Agency:	EPA Region 9

## Predictive Filing

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Did this RMP involve predictive filing?:

## Preparer Information

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Preparer Name:	Tracer ES&T
Preparer Phone:	(760) 744-9611
Preparer Street 1:	970 Los Vallecitos Blvd, Suite 100
Preparer Street 2:	
Preparer City:	San Marcos
Preparer State:	CALIFORNIA
Preparer ZIP:	92069
Preparer ZIP4:	1474
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

## Confidential Business Information (CBI)

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CBI Claimed:  
Substantiation Provided:  
Unsanitized RMP Provided:

## Reportable Accidents

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Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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## Process Chemicals

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Process ID:	1000002048
Description:	Chlorine Transfer
Process Chemical ID:	1000002238
Program Level:	Program Level 3 process
Chemical Name:	Chlorine
CAS Number:	7782-50-5
Quantity (lbs):	14000
CBI Claimed:	
Flammable/Toxic:	Toxic

## Process NAICS

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Process ID:	1000002048
Process NAICS ID:	1000002138
Program Level:	Program Level 3 process
NAICS Code:	56179
NAICS Description:	Other Services to Buildings and Dwellings

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000001511

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP Guidance for Waste Water Treatment Plants Reference Tables or Equations
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

- Dikes:
- Enclosures:
- Berms:
- Drains:
- Sumps:
- Other Type:

## Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000001798

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Percent Weight:

Physical State:

Model Used:

Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

Gas liquified by pressure

EPA's RMP Guidance for Waste Water Treatment  
Plants Reference Tables or Equations

3.0

D

Urban

### Passive Mitigation Considered

Dikes:

Enclosures:

Berms:

Drains:

Sumps:

Other Type:

### Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Neutralization:

Excess Flow Valve:

Flares:

Scrubbers:

Emergency Shutdown:

Other Type:

## **Section 4. Flammables: Worst Case**

No records found.

## **Section 5. Flammables: Alternative Release**

No records found.



## Section 6. Accident History

No records found.

## Section 7. Program Level 3

### Description

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Chlorine is transferred from one ton containers to 20 pound containers for use in disinfecting pools for residential homes

### Program Level 3 Prevention Program Chemicals

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Prevention Program Chemical ID:	1000001511
Chemical Name:	Chlorine
Flammable/Toxic:	Toxic
CAS Number:	7782-50-5

Prevention Program Level 3 ID:	1000001257
NAICS Code:	56179

### Safety Information

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Safety Review Date (The date on which the safety information was last reviewed or revised):	14-Apr-2009
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### Process Hazard Analysis (PHA)

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PHA Completion Date (Date of last PHA or PHA update):	19-Feb-2009
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### The Technique Used

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What If:	Yes
Checklist:	Yes
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	01-Feb-2010

### Major Hazards Identified

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Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	

Tornado:  
Hurricanes:  
Other Major Hazard Identified:

## Process Controls in Use

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Vents:  
Relief Valves:  
Check Valves:  
Scrubbers: Yes  
Flares:  
Manual Shutoffs: Yes  
Automatic Shutoffs: Yes  
Interlocks:  
Alarms and Procedures: Yes  
Keyed Bypass:  
Emergency Air Supply:  
Emergency Power:  
Backup Pump:  
Grounding Equipment:  
Inhibitor Addition:  
Rupture Disks:  
Excess Flow Device:  
Quench System:  
Purge System:  
None:  
Other Process Control in Use: fuse plugs

## Mitigation Systems in Use

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Sprinkler System:  
Dikes:  
Fire Walls:  
Blast Walls:  
Deluge System:  
Water Curtain:  
Enclosure:  
Neutralization:  
None: Yes  
Other Mitigation System in Use:

## Monitoring/Detection Systems in Use

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Process Area Detectors: Yes  
Perimeter Monitors:  
None:  
Other Monitoring/Detection System in Use:

## Changes Since Last PHA Update

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Reduction in Chemical Inventory:  
Increase in Chemical Inventory:  
Change Process Parameters:  
Installation of Process Controls:  
Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Other Changes Since Last PHA or PHA Update: improvement in labeling and piping policies

## Review of Operating Procedures

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Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 14-Apr-2009

## Training

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Training Revision Date (The date of the most recent review or revision of training programs): 25-Jun-2008

## The Type of Training Provided

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Classroom: Yes

On the Job: Yes

Other Training:

## The Type of Competency Testing Used

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Written Tests:

Oral Tests:

Demonstration: Yes

Observation: Yes

Other Type of Competency Testing Used:

## Maintenance

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Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 25-Jun-2008

Equipment Inspection Date (The date of the most recent equipment inspection or test): 19-Feb-2009

Equipment Tested (Equipment most recently inspected or tested): chlorine container and piping

## Management of Change

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Change Management Date (The date of the most recent change that triggered management of change procedures):

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 25-Jun-2008

## Pre-Startup Review

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Pre-Startup Review Date (The date of the most recent pre-startup review):

## Compliance Audits

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Compliance Audit Date (The date of the most recent compliance audit): 25-Jun-2008

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 19-Feb-2009

## Incident Investigation

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Incident Investigation Date (The date of the most recent incident investigation (if any)): 08-Jul-1996

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 06-Apr-1999

## Employee Participation Plans

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Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 25-Jun-2008

## Hot Work Permit Procedures

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Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 25-Jun-2008

## Contractor Safety Procedures

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Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 25-Jun-2008

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

## Confidential Business Information

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CBI Claimed:

## **Section 8. Program Level 2**

## Section 9. Emergency Response

### Written Emergency Response (ER) Plan

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Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?):

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Healthcare (Does facility's ER plan include information on emergency health care?):

### Emergency Response Review

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Review Date (Date of most recent review or update of facility's ER plan):

### Emergency Response Training

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Training Date (Date of most recent review or update of facility's employees):

### Local Agency

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Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Rural Metro Fire Department

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (520) 575-1839

### Subject to

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OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify):

## Executive Summary

### ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES

Pool Chlor of Tucson provides chlorination for recreational swimming pools in the Tucson, Arizona area. Pool Chlor of Tucson has ensured a safe operation dating back to 1967.

Pool Chlor's general manager and owner are personally committed to offer superior service and to maintain a safety and environmental program to promote a safe environment for all its employees and the surrounding communities. The general manager administers the company's safety and environmental policies. He is also responsible for various inspections to ensure compliance, and oversees the entire safety and environmental programs. These programs include, hazard communications, employee safety manuals, manufacturers documentation, Emergency Response, as well as the Risk Management Plan.

### FACILITY AND REGULATED SUBSTANCE HANDLED

Startup of the chlorine system occurred in 1967. The process is located at 3116 East Pennsylvania Ave., Tucson, Arizona 85714. The chlorine system for Pool Chlor of Tucson consists of chlorine one-ton containers which are the storage vessels. Chlorine gas is drawn from the ton container to 20-pound cylinders. The following is a list of the chlorine equipment.

Chlorine Tanks (one-ton containers)  
(7 - Maximum that can be stored) Located at the south end of the facility

Chlorine Tanks (20-pound containers)  
(150 - Maximum that can be stored): Located on operators' trucks

Filling Manifold: Located at the south end of the facility.

Scrubber System: Located at the south end of the facility.

Chlorine Sensor: Located at the south end of the facility.

The maximum quantity of chlorine that can be stored on site is 14,000 pounds.

### ACCIDENTAL RELEASE PREVENTION PROGRAM AND CHEMICAL-SPECIFIC PREVENTION STEPS

Pool Chlor of Tucson has a Process Safety Management program in place to manage the handling of chlorine. In addition, common industry standards, policies, and procedures are utilized to ensure safe practices are being performed. This includes common practices outlined by the Chlorine Institute and the National Association of Gas Chlorinators. In addition to the Management Programs, there is a scrubber system that is used to neutralize residual chlorine after the transfer process.

### FIVE YEAR ACCIDENT HISTORY

An investigation into the Pool Chlor of Tucson facility's accident history revealed that there have been no reportable chlorine releases over the past five years (March 2004 - March 2009) that exceeded the Federal Reportable Quantity of 10 pounds. In addition, there have been no injuries resulting from a chlorine release.

### EMERGENCY RESPONSE PROGRAM

Pool Chlor of Tucson is a designated non-responding facility. In the event of an accidental release of chlorine, Pool Chlor of Tucson will call 911 in order to reach the Tucson Fire Department's HAZMAT team. Pool Chlor of Tucson has a B-kit available at the facility for emergency responder to use to mitigate a chlorine release. Employees will evacuate the facility to a point that is upwind of the hazard. Evacuation drills are performed annually. The emergency action plan provides the response organization and notification procedures, and mitigation procedures which will be implemented to respond effectively to emergency situations that may arise at the facility. This plan was reviewed and updated to ensure compliance with the PSM and RMP regulations, and to ensure that the plan is kept current.



#### PLANNED CHANGES TO IMPROVE SAFETY

Pool Chlor of Tucson has revalidated the Process Hazard Analysis (February 2009) which generated mitigation measures (recommendations) to improve safety at the Pool Chlor facility. The scheduled completion date of all changes resulting from the PHA Revalidation is February 2010. In the meantime, Pool Chlor of Nevada's safety committee has completed several items, including some recommendations, in a continual effort to provide a safe work environment for their employees. These changes include the following items:

1. Continue to train all employees in Process Safety Management and the facility's Safety Plan/Programs.
2. Continue to have employee involvement in Safety Plan Development.
3. Continue employee involvement through safety team participation.
4. Continue internal and external safety audits/inspections and implement changes as needed.